

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, *et al.*,

Plaintiffs,

v.

JASON KESSLER, *et al.*,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

JURY TRIAL REQUESTED

PLAINTIFFS' DEPOSITION DESIGNATIONS OF DEFENDANT ELLIOT KLINE

Plaintiffs, by and through their counsel, respectfully submit these deposition designations of Defendant Elliot Kline's deposition taken on August 12, 2020. Plaintiffs did not previously file deposition designations for Mr. Kline because he was expected to testify at trial. Given that Mr. Kline has not appeared at trial or indicated any willingness to do so, Plaintiffs now plan to present his testimony by deposition.

Plaintiffs continue to reserve the right to: (a) use audio and/or video deposition excerpts and/or create demonstrative exhibits; (b) use any deposition designations listed by Defendants; (c) supplement these designations with those of any persons listed as trial witnesses by any party in the event that such witnesses are not available to testify at trial or are not called at trial; (d) designate additional portions of deposition transcripts for the purpose of authentication of documents, if required; (e) designate any deposition testimony taken after the date of these designations; and (f) use any and all deposition and/or trial testimony, whether or not designated, for cross-examination, impeachment, or rebuttal purposes.

Deposition Transcript:	Designations:
Elliot Kline, August 12, 2020	6:03 - 6:05 24:14 - 24:19 25:05 - 25:09 25:22 - 27:18 30:07 - 30:21 31:04 - 31:09 31:19 - 32:17 33:14 - 33:25 37:18 - 37:24 38:12 - 38:15 38:17 - 40:03 42:08 - 42:24 44:09 - 44:11 44:15 - 44:25 45:06 - 45:15 47:09 - 48:03 48:08 - 49:08 51:02 - 51:12 52:06 - 52:14 53:07 - 54:09 56:05 - 57:12 62:16 - 62:25 63:08 - 64:03 67:02 - 67:10 68:03 - 68:19 68:23 - 69:14 69:24 - 70:24 71:05 - 71:18 73:03 - 73:24 74:04 - 74:14 81:10 - 82:18 82:24 - 84:02 90:02 - 90:05 90:07 - 90:18 91:03 - 91:17 95:16 - 95:20 96:18 - 97:07 99:16 - 99:25 100:18 - 101:10 108:20 - 110:17 114:09 - 114:12 114:19 - 115:09 115:17 - 115:23 116:14 - 116:23 117:03 - 117:06

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Dated: November 1, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

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